

## Questions and Answers for Home Delivery of Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) Meals during Summer 2020

To implement home delivery, sponsors must submit an application to the CSDE. The application must demonstrate that the sponsor can meet the USDA's requirements for [area eligibility](#), written parent or guardian consent for meal delivery, and protecting the confidentiality of children and their households during meal delivery. For specific information, see the CSDE's application form, [Application for Providing Home Delivery for Meals during Summer 2020](#).

If approved by the CSDE, the waiver remains in effect until **August 31, 2020**, or until expiration of the federally declared public health emergency, whichever is earlier.



The questions and answers below provide guidance on the requirements for home delivery during school closures due to COVID-19.

**1. Can sponsors that have been approved for providing non-congregate meals through the SFSP or SSO deliver meals directly to students' homes?**

Yes. Due to student confidentiality and logistical requirements, this option is only available to school food authority (SFA) sponsors of school sites. If the SFA determines there is a need and it is logistically feasible to deliver meals directly to homes, it may do so with CSDE approval, adherence to all federal confidentiality requirements, and with all necessary federal waiver approvals (including an approval for non-congregate feeding). Delivery could be completed by mail or delivery service, or hand-delivered by school staff, volunteers, community organizations, or others. SFA sponsors electing to deliver meals must be operating area eligible meal service and distribution sites. SFA sponsors must also meet the requirements to establish meal service times at [7 CFR 225.6\(c\)\(2\)\(i\)\(B\) and \(c\)\(3\)\(i\)\(A\)](#). A SFA's delivery plan with designated times for distribution, when approved by the CSDE, would fulfill the requirements to establish meal service times.

**2. What funding is available for meal delivery?**

There is no additional reimbursement for home delivery or mobile meals delivery, but related expenses, such as postage or delivery service fees, would be considered an allowable cost under the SFSP or SSO. Delivery costs could also be paid with non-program funds such as state or local funds, or private donations.

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### 3. Who is eligible to receive home-delivered meals under SFSP and SSO?

SFA sponsors operating authorized area eligible sites may deliver meals to all children 18 years old and younger in their service area<sup>1</sup>.

### 4. What are the requirements for initiating home meal delivery for a household?

Schools must first obtain written consent from households of eligible children that the household wants to receive delivered meals. Written consent could include e-mail or other electronic means. In addition, schools should confirm the household's current contact information and the number of eligible children in the household, to ensure the correct number of meals are delivered to the correct location.

It is critical that schools protect the confidentiality of students and their households throughout this process. The National School Lunch Act (NSLA) and the Family Educational Rights and Privacy Act (FERPA) do not authorize release of household contact information for children without first obtaining the written consent of the child's parent or guardian.

The school must be the entity that makes the first contact about meal delivery with the households of eligible children, and must notify the household if contact information will be shared with an external organization, for example, a local non-profit that will provide meal delivery. Once the school receives written consent from the parent or guardian to release contact information, the school may share the information with other organizations involved with meal delivery.

If the school is using a private or public non-profit vendor or any other entity to deliver meals, the regulations implementing the NSLA require the school to have a memorandum of understanding (MOU) with the vendor or third party concerning the confidentiality requirements. The MOU should include information such as what will be disclosed, how the information will be used, how the information will be protected from unauthorized uses and disclosures, and penalties for unauthorized disclosure. For further requirements, see [7 CFR 225.15\(k\)\(1\)-\(2\)](#). To safeguard household confidentiality, the school must ensure data is handled appropriately at all times and by all organizations involved with meal delivery.

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<sup>1</sup> A person 19 years of age and over who has a mental or physical disability (as determined by a State or local educational agency) and who participates during the school year in a public or private non-profit school program (established for the mentally or physically disabled) is also eligible to receive meals.

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**5. How many home-delivered meals per child may be delivered at once?**

The maximum number of meals that may be offered to each child remains the same as required by the SFSP or SSO. Sponsors may provide up to two meals, or one meal and one snack, per child per day, in any combination except lunch and supper. The CSDE may approve a distribution approach that includes meals for multiple days, up to one week at a time. The USDA indicates that state agencies should consider the expected duration of the school closure and the capacity of the SFA to execute such an approach effectively, including meeting state or local food safety requirements.

**6. Do home-delivered meals need to be shelf-stable?**

No. The type of meal offered will depend on the resources and capacity of the site. Sponsors that are able to prepare ready-to-eat meals, and have the capacity to deliver meals daily in a way that meets state or local food safety requirements, may do so. Home-delivered meals must still meet all meal pattern requirements of the SFSP or SSO unless the CSDE approves a meal pattern waiver request.

**7. Does the child need to be present for home meal delivery?**

No. As long as the school has obtained the household's written consent to deliver meals and has verified the current address, the student does not need to be present at the time of delivery. If the meals are shelf-stable, no one need be present, as long as the address has been verified. Please consider food safety practices, state and local food safety requirements and best practices regarding temperature control of meals.

**8. If a household has children in multiple schools, can the schools coordinate to provide one home delivery for all children in the household?**

Yes. To the extent feasible, SFAs or schools are encouraged to coordinate their deliveries to make the best use of their resources.

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For more information, visit the CSDE's [Operation of Child Nutrition Programs during Coronavirus \(COVID-19\) Outbreaks](#) webpage or contact the [CACFP staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at [https://portal.ct.gov/-/media/SDE/Nutrition/COVID-19/CSDE\\_Home\\_Delivery\\_Q&A\\_Summer2020.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/COVID-19/CSDE_Home_Delivery_Q&A_Summer2020.pdf).

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Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
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- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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